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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**KATHERINE NIEDERMEYER,**

**Case No. 3:21-cv-00904-HZ**

**Plaintiff,**

**JOINT STIPULATED MOTION  
FOR EXTENSION OF CASE  
DEADLINES**

v.

**LINCOLN LIFE ASSURANCE  
COMPANY OF BOSTON,**

**Expedited review requested**

**Defendant.**

**CERTIFICATION PER L.R. 7.1**

The undersigned have conferred and are in agreement regarding this motion.

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**JOINT STIPULATED MOTION  
TO EXTEND CASE DEADLINES - Page 1 of 2**

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**MOTION**

The parties hereby move for an order extending the current case deadlines in this ERISA-governed benefit case (29 U.S.C. 1132(a)(1)(b)), by 30 days, as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery cutoff	02/21/22	03/23/22
Plaintiff's Dispositive Motion	03/14/22	04/13/22
Defendant's Cross-Dispositive Motion and Response to Plaintiff's Motion	04/04/22	05/04/22
Plaintiff's Response and Reply	04/25/22	05/25/22
Defendant's Reply	05/16/22	06/15/22

The parties are engaged productively in settlement negotiations. Settlement involves significant taxation issues and Plaintiff requires additional time to address those issues. This motion is intended to allow sufficient time for the parties to complete negotiations and to prepare and file their dispositive motions if negotiations do not result in a settlement.

For the reasons set forth above, the parties respectfully request that the Court grant this motion, extending the case deadlines as stated above.

DATED: February 16, 2022.

Respectfully Submitted,

s/ Megan E. Glor

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Attorneys for Defendant

**JOINT STIPULATED MOTION  
TO EXTEND CASE DEADLINES - Page 2 of 2**

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